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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

MAR 17 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Revision of the Commission's rules
to ensure compatibility with
enhanced 911 emergency calling systems

)
) CC Docket No. 94-102
)
) RM-8143

) DOCKET FILE COPY ORIGINAL

The NYNEX Companies' Reply Comments

The NYNEX Companies hereby file their Reply to the Comments that were filed in response to the Commission's October 19, 1994 Notice of Proposed Rulemaking ("NPRM") in the above captioned proceeding.

I. **INTRODUCTION AND SUMMARY**

In the NPRM, the Commission proposes to adopt rules to ensure compatibility between Private Branch Exchanges ("PBXs") and enhanced 911 ("E911") services and proposes to require that wireless providers that offer real time voice services include features that will make E911 services available to mobile radio callers.

NYNEX supports the rules proposed in the NPRM with minor modifications¹ and provided that those rules are implemented in the least costly manner and the cost burdens associated therewith are assigned appropriately. While the majority of commenters support the Commission's proposed PBX rules, many share NYNEX's view that the Commission must await the development of appropriate cost recovery methodologies

¹ NYNEX comments at 4-8.

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before implementing its proposals.² Accordingly, NYNEX recommends that the Commission defer its adoption of PBX rules until State and local authorities resolve E911 cost recovery issues.

The Commission's proposals for wireless services have drawn substantial criticism from a number of commenters. These commenters have raised a substantial number of issues which clearly demonstrate that the Commission's proposals for wireless emergency access are premature at this juncture.³ After our review of the positions of the parties, we are firmly convinced that the best approach to achieve wireless E911 access is one which allows marketplace forces to determine when, and how best, to implement E911 access from wireless systems.

II. THE COMMENTS SUPPORT THE COMMISSION'S PBX PROPOSALS WITH SOME MINOR MODIFICATIONS

Many of the comments describe the significant cost burdens that are incurred by telephone companies in maintaining, storing and processing updates to ALI records associated with PBX systems.⁴ Those commenters correctly urge the Commission to avoid adopting any E911 access requirements or rules that would impose any additional costs on telephone companies providing E911 or other E911 service providers.⁵ We believe, in addition, that the Commission should defer issues concerning how those cost

² See, e.g., Ameritech, Bell Atlantic NARUC, Pacific Tel., SBC, NATA and ICA.

³ See generally, comments filed by NYNEX, CTIA, GTE, BellSouth, Bell Atlantic, GTE, Springwiche Cellular, Alltel, US West, Ameritech, NATA, NARUC, UTC, Pacific Tel., Illinois Telephone Assoc., PCIA, RCA, SBC and ICA.

⁴ See, e.g., comments filed by Ameritech, GTE, SBC and US West.

⁵ Id.

burdens should be recovered to states and local emergency services authorities. In the absence of appropriate cost recovery methods, it is premature to adopt any PBX E911 rules.

A number of commenters address concerns regarding the use of ISDN technology to provide connectivity directly from a PBX to a Public Safety Answering Point ("PSAP").⁶ NYNEX agrees with the commenters that complex and unresolved technical issues exist in this area.⁷ For example, a methodology must be developed to distinguish E911 ANI from call processing ANI for purposes of NPA translation. ANI transmitted from an end office to the 911 tandem is modified by the tandem prior to its re-transmission to the PSAP. The first character of the ANI message is changed to a number plan digit that indicates the NPA from which the call originated. It is currently not known whether the 911 tandem will be able to provide this functionality for PBXs when ANI is transmitted from the PBX to the PSAP using ISDN technology.⁸ This technical issue and associated cost considerations must be fully resolved before ISDN E911 is implemented.⁹

⁶ See, e.g., comments filed by SBC and GTE.

⁷ NYNEX is conducting research in this area and is involved in plans to provide service to one ISDN-equipped PSAP in New York City in late 1995.

⁸ The use of ISDN technology for E911 calls from PBXs also raises technical questions regarding the capability of the 911 tandem to provide other functions for such calls. Currently the 911 tandem supports the 911 network by providing many functions required by the PSAPs, such as, selective routing, selective transfer, ring back and forced disconnect. It is not known whether the 911 tandem will be able to provide these functions for calls originating from PBXs using ISDN technology.

⁹ At the March NENA conference, the industry decided to investigate the possibility of interconnecting ISDN-equipped PBXs to the public switched telephone network in order to provide access to E911 services using network facilities. The industry also recommended that PBXs should not be directly connected to PSAPs, because such interconnections would not provide PSAPs with access to the functionality provided by the 911 tandem.

III. THE COMMENTS DEMONSTRATE THAT THE COMMISSION'S PROPOSED RULES FOR WIRELESS E911 ACCESS ARE PREMATURE

A. The Commission's Proposals Are Not Feasible Given The Current State Of Technology

The record demonstrates that technology does not exist which will permit wireless service providers to fully comply with the Commission's proposals.¹⁰ Indeed, the few equipment manufacturers who indicate that E911 wireless access technology may exist, describe prototype products which are based on technologies that are not fully tested and not yet available for deployment.¹¹ As such, it would simply be impossible for wireless carriers to comply with the proposals set forth in the NPRM.

In the absence of existing technologies, NMCC has worked with local committees to provide 911 services to our customers and has maintained ongoing efforts aimed at educating and informing them about emergency services and appropriate emergency procedures within their service areas. Market pressures have been adequate to prompt firms, including NMCC, to ensure that current emergency service needs are fully satisfied. In addition, market pressures have prompted firms to engage in research and development activities in connection with technologies that could be used to support

¹⁰ US West argued, for example, that that "there is no equipment on the market, at least no equipment capable of supporting an integrated, cost effective and reliable solution". US West comments at 6. AMTA demonstrated that the Commission's "proposal raises significant technical and operational issues which may not be susceptible to reasonable resolution within the timeframe set out in the Notice". AMTA comments at 2. CTIA notes that the character of wireless technology raises unique and, to date, unresolved issues related to E911 access. CTIA comments at 3-4, 7. The technical issues described by these commenters reflect the fact that, because it is not associated with a unique address, location information is likely to be both immaterial and inaccurate for purposes of wireless emergency calls. See generally, comments filed by RCA, CTIA, US West, Bell Atlantic, Pacific Bell, Nevada Bell and Pacific Bell Mobile.

¹¹ See generally, comments filed by KLM, Smith Advanced Technology and Tendler Cellular.

wireless ALI features.¹² The Commission should continue to rely on market pressures to promote the deployment of wireless E911 and to ensure that enhanced wireless E911 capabilities are defined and developed consistent with technical and financial constraints.¹³ The industry has worked with the emerging service providers to implement emergency services in the wireless environment.¹⁴ These joint efforts will continue to enable us to provide E911 capabilities in the most efficient manner possible.

B. No Economic Justification Exists for Wireless E911 Access

PSAPs that filed comments wholeheartedly endorse the Commission's proposals,¹⁵ but offered no evidence of their financial commitment to E911. The record does not demonstrate that PSAPs are willing to pay for the substantial instrument that would be required to implement the Commission's proposals.¹⁶ Therefore, no economic justification supports the Commission's stringent implementation rules.

¹² See, e.g., Ameritech comments at 10.

¹³ CTIA comments at 2-3. Indeed, NYNEX and others already comply with most aspects of the NPRM's "Phase 1" proposal. See, e.g., Ameritech comments at 8-10.

¹⁴ In its comments, Springwiche made the claim that wireless E911 access in Massachusetts was impeded in New England. Springwiche's claim is unfounded. The New England E911 Project Management Staff has been working with the Massachusetts's Statewide Emergency Telecommunications Board (SETB) since early 1993 to define and implement an E911 wireless solution based on cell-site identification. NYNEX has actively participated in this project at the direction of the SETB. Cellular licensees including Cellular One, Bell Atlantic and SNET also joined this effort. Attached you will find a letter from the SETB's Executive Director placing the project on temporary hold pending the FCC's resolution of the instant NPRM.

¹⁵ See, e.g., comments filed by Maryland Emergency Number Systems Board, King County Police, Thurston County Department of Communications, Peninsula Communications, AACOG, Carter County, Georgia Chapter APCO, and APCO/NENA/NASNA.

¹⁶ See, e.g., CTIA comments at 19, NATA comments at 2-3. The record does not show that any PSAP has made the capital expenditures necessary to update and modernize their systems and train their personnel to handle the information transmitted to it.

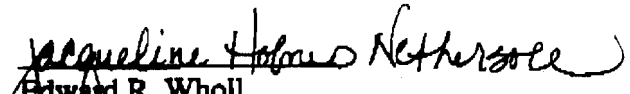
Any requirement that carriers deploy a full set of E911 capabilities, including a wireless ALI feature, in areas where public safety organizations have chosen not to provide enhanced 911 service is unreasonable. Since local needs and funding vary, it simply does not make sense to require wireless carriers to provide enhanced 911 capabilities at all unless the public safety organization served by that wireless carrier upgrades its system and is able to use the information.¹⁷

IV. CONCLUSION

The Commission should adopt its PBX proposals, modified as NYNEX suggests. However, the record does not support the Commission's proposed rules for wireless E911 service. We believe that the best approach to achieve wireless E911 service in a technologically and economically sound manner is to rely on market pressures to promote the provision of those services.

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Dated: March 17, 1995

¹⁷ CTIA comments at 19-20.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing The NYNEX Companies' Reply Comments, was served by first class United States Mail, postage prepaid, on each of the parties indicated on the attached service list, this 17th day of March, 1995.


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